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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 **DECLARATION OF ANDREA PALLIOS**
ROBERTS

23 vs.

24 UBER TECHNOLOGIES, INC.;
25 OTTOMOTTO LLC; OTTO TRUCKING
26 LLC,

27 Defendants.

28

1 I, Andrea Pallios Roberts, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC (“Waymo”). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of correspondence from myself to
7 Defendants’ counsel dated May 30, 2017 attaching a [Proposed] Stipulated Order Regarding the
8 Production of Electronically Stored Information.

9 3. Attached as Exhibit 2 is a true and correct copy of correspondence from myself to
10 Defendants’ counsel dated June 2, 2017.

11 4. Attached as Exhibit 3 is a true and correct copy of correspondence from myself to
12 Defendants’ counsel dated June 7, 2017.

13 5. Attached as Exhibit 4 is a true and correct copy of correspondence from myself to
14 Defendants’ counsel dated June 8, 2017.

15 6. Attached as Exhibit 5 is a true and correct copy of correspondence from myself to
16 Defendants’ counsel dated June 14, 2017.

17 7. With the exception of a June 2 email from Uber’s counsel saying they would
18 follow up “early next week,” none of Defendants responded to the correspondence attached as
19 Exhibits 1-5.

20 8. Attached as Exhibit 6 is a true and correct copy of a document Waymo produced in
21 this litigation bearing Bates number WAYMO-UBER-00014078-14098.

22 9. Attached as Exhibit 7 is a true and correct copy of a document Waymo produced in
23 this litigation bearing Bates number WAYMO-UBER-00033665.

24 10. Attached as Exhibit 8 is a true and correct copy of a document Waymo produced in
25 this litigation bearing Bates number WAYMO-UBER-00014099.

26 11. Attached as Exhibit 9 is a true and correct copy of a document Waymo produced in
27 this litigation bearing Bates number WAYMO-UBER-00014449.

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1 12. Attached as Exhibit 10 is a true and correct copy of a document Waymo produced
2 in this litigation bearing Bates number WAYMO-UBER-00014469.

3 13. Attached as Exhibit 11 are true and correct copies of an email that Uber produced
4 at least twelve copies of.

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct.

7 DATED: August 5, 2017

/s Andrea Pallios Roberts

Andrea Pallios Roberts

10 **SIGNATURE ATTESTATION**

11 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
12 filing of this document has been obtained from Andrea Pallios Roberts.

14 */s/ Charles K. Verhoeven*

15 Charles K. Verhoeven